Law Office of Daniel H Goodman LLC

ATTORNEYS AT LAW

9701 W. HIGGINS RD.
SUITE 601
ROSEMONT, ILLINOIS 60018
TREPHONE 847/292-6000
FAX 847/292-0390

DANIEL E GODDMAN
BARY W. KLAGES
TERRY M. LACHCIK
MARK A. HEFTMAN
MICHAEL A. MODRE
AMY L. HARRIMAN
JADK M. SHAFIRD
CHAE M. LEE
BENJAMIN A. SWEENEY

July 1, 2016

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED & FIRST CLASS US MAIL

Environmental Protection Agency Ralph H. Metcalfe Federal Building 77 W Jackson Blvd. Chicago, IL 60604

RE: Vicki Brady v. Timothy Stokes and Paulette Stokes

Date Of Accident: March 4, 2014

Location Of Accident: 5830 North Oconto, Chicago, IL 60631

Chicago Police Report No.: HX172415

Dear Sir or Madam:

Please be advised that I represent Vicki Brady in relation to a personal injury lawsuit that was filed as a result of injuries that she sustained arising out of a slip and fall on the sidewalk which was covered with ice that had accumulated from water from the downspout of the private residence owned by the Defendants, Timothy Stokes and Pauletie Stokes at 5830 North Oconto Avenue, Chicago, Illinois on March 4, 2014 at 5830 North Octonto in Chicago, Illinois at approximately 3:15 p.m. You will find enclosed a Subpoena requiring you to provide requested documentation to my office by July 15, 2016.

Your anticipated cooperation is appreciated.

Sincerely,

LAW OFFICE OF DANIEL E GOODMAN, LLC

Michael A. Moore

MAM/mcl Enclosure

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

VICKI BRADY and MICHAEL LAMMERSFELD		
v. Plaintiff Petitioner	No. 2015 L 008065	
TIMOTHY STOKES and PAULETTE M. STOKES		
Defendant/Respondent	,	
SUBPOENA IN A CIV (For Testimony and/or		
To: Environmental Protection Agency		
Ralph H. Metculfe Federal Building		
77 W Jackson Blvd., Chicago, IL 60604		
1. YOU ARE COMMANDED to appear to give your testimous before the in Room	Honorable, Illinois oo	
Rt m.		
2. YOU ARE COMMANDED to appear and give your deposition testimony be	fore a Notary Public at:	
in Room	, littinois on	
at m.	33102013-011	
	I my Office of Daniel V Gree	bear IIC
 YOU ARE COMMANDED to mail the following documents in your possess at 9701 W. Higgins Rd., Stc. 601, Rosemont, Illinois, 60018 	on or before July 15	2016
- 11:00 x	, on or bettere	
(THIS IS FOR RECORDS ONLY. THERE WILL BE NO ORAL INTERROG.	ATORIES &	
And all documentation including but not limited to secondings, call logs, correspondence, e-	[2] [1] [1] [1] [1] [1] [1] [1] [1] [1] [1	diagrams, or any other
	mails, reports, violation notices issued, photographs,	margin margin or mild in mary
documentation/information in your possession regarding complaints made by Vicki Brady at		
in relation to the property located at 5820 North Oconto, Chicago, Illinois owned by Tim Description continued on attached page(s). YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO	ad/or Michael Lammersfield (both residing at 5820 N ofthy Strikes and Paulette Stokes from January 1, 20	orth Oceato, Chicago, II., 60631 60 through December 31, 2014
in relation to the property located at \$820 North Oconto, Chicago, Illinois owned by Tim Description continued on attached page(s). YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO	ad/or Michael Lammersfield (both residing at 5820 N offly Stokes and Paulette Stokes from January 1, 20 PUNISHMENT FOR CONTEMPT OF THIS n, or governmental agency. The matter(s) or	orth Oceato, Chicago, II., 60631 60 through December 31, 2014 COURT.
in relation to the property located at \$820 North Oconto, Chicago, Illinois owned by Tim Description continued on attached page(s). YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO Notice to Deponent: 1. The deponent is a public or private corporation, partnership, association	d/or Michael Lammersfield (both residing at 5820 N offly Stokes and Paulette Stokes from January 1, 20 PUNISHMENT FOR CONTEMPT OF THIS a, or governmental agency. The matter(s) or directors, or managing agents, or other person at person will testify. III. Sup. Ct. Rule 206.)	orth Oceate, Chicago, II., 60631 60 through December 31, 2014 COURT. which examination is
in relation to the property located at 5820 North Oconto, Chicago, Illinois owned by Tim Description continued on attached page(s). YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO Notice to Deponent: 1. The deponent is a public or private corporation, partnership, association requested are as follows: Description continued on attached page(s). (A nonparty organization has a duty to designate one or more officers, and may set forth, for each person designated, the matters on which the 2. The deponent's testimony will be recorded by use of an audio-visual recorded by stipulation of the parties or by order upon showing that good cause to by stipulation of the parties or by order upon showing that good cause to the content of the parties or by order upon showing that good cause to the content of the parties or by order upon showing that good cause to the content of the parties or by order upon showing that good cause to the content of the parties or by order upon showing that good cause to the content of the content of the parties or by order upon showing that good cause to the content of the cont	dor Michael Lammersfield (both residing at 5820 Northy Stokes and Paulette Stokes from January 1, 20 PUNISHMENT FOR CONTEMPT OF THIS a, or governmental agency. The matter(s) or directors, or managing agents, or other person t person will testify. III. Sup. Ct. Rule 206.) ording device, operated by (Name of Re- urs regardless of the number of parties involved.)	orth Oconto, Chicago, II., 60631 60 through December 31, 2014 COURT. which examination is senting Device Operator) red in the case, except
in relation to the property located at 5820 North Oconto, Chicago, Illinois owned by Tim Description continued on attached page(s). YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO Notice to Deponent: 1. The deponent is a public or private corporation, partnership, association requested are as follows: Description continued on attached page(s). (A nonparty organization has a duty to designate one or more officers, and may set forth, for each person designated, the matters on which the 2. The deponent's testimony will be recorded by use of an audito-visual record of the parties or by order upon showing that good cause that you with the content of the parties or by order upon showing that good cause that you will be content upon showing that good cause that you will be content upon showing that good cause that you will be content upon showing that good cause that you will be content upon showing that good cause that you will be content upon showing that good cause that you will be content upon showing that good cause that you will be content upon showing that good cause that you will be content upon showing that good cause that you will be content upon showing that good cause that you will be content upon showing that good cause that you will be content upon showing that good cause that you will be content upon showing that good cause that you will be content upon showing that good cause that you will be content upon showing the content upon upon the content upon upon the content upon the content upon the content upon the cont	dor Michael Lammersfield (both residing at 5820 Northy Stokes and Paulette Stokes from Jamury 1, 20 PUNISHMENT FOR CONTEMPT OF THIS II, or governmental agency. The matter(s) or directors, or managing agents, or other person at person will testify. III. Sup. Ct. Rule 206.) cording device, operated by (Name of Re- urs regardless of the number of parties havely warrants a lengthier examination. III. Sup. C	orth Oconto, Chicago, II., 60631 60 through December 31, 2014 COURT. which examination is senting Device Operator) red in the case, except
in relation to the property located at 5820 North Oconto, Chicago, Illinois owned by Tim Description continued on attached page(s). YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO Notice to Deponent: 1. The deponent is a public or private corporation, partnership, association requested are as follows: Description continued on attached page(s). (A nonparty organization has a duty to designate one or more officers, and may set forth, for each person designated, the matters on which the continued of the parties of an audio-visual recorded by use of an audio-visual recorded by stipulation of the parties or by order upon showing that good cause of the continued of the parties of Daniel E Goodman, LLC Name: Michael A. Moore / Law Office of Daniel E Goodman, LLC	dor Michael Lammersfield (both residing at 5820 Northy Stokes and Paulette Stokes from Jamunry 1, 20 PUNISHMENT FOR CONTEMPT OF THIS II, or governmental agency. The matter(s) or directors, or managing agents, or other person t person will testify. III. Sup. Ct. Rule 206.) cording device, operated by [Name of Re- urs regardless of the number of parties lavols warrants a lengthier examination. III. Sup. C	orth Counto, Chicago, II., 60631 60 through December 31, 2014 COURT. which examination is us to testify on its behalf, conling Desice Operator) ed in the case, except t. Rule 206(d).
in relation to the property located at 5820 North Oconto, Chicago, Illinois owned by Tim Description continued on attached page(s). YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO Notice to Deponent: 1. The deponent is a public or private corporation, partnership, association requested are as follows: Description continued on attached page(s). (A nonparty organization has a duty to designate one or more officers, and may set forth, for each person designated, the matters on which the continued on attached page(s) and may set forth, for each person designated, the matters on which the set of the deponent's testimony will be recorded by use of an audio-visual recorded by stipulation of the parties or by order upon showing that good cause of the parties of the parties of by order upon showing that good cause of the parties of the parties of Daniel E Goodman, LLC Name: Michael A. Moore / Law Office of Daniel E Goodman, LLC Atty. for: Plaintiff	dor Michael Lammersfield (both residing at 5820 Northy Stokes and Paulette Stokes from Jamunry 1, 20 PUNISHMENT FOR CONTEMPT OF THIS a, or governmental agency. The matter(s) or directors, or managing agents, or other perso at person will testify. III. Sup. Ct. Rule 206.) ording device, operated by (Name of Re ars regardless of the number of parties favolves warrants a lengthier examination. III. Sup. C	orth Counto, Chicago, II., 60631 60 through December 31, 2014 COURT. which examination is us to testify on its behalf, conling Desice Operator) ed in the case, except t. Rule 206(d).
in relation to the property located at 5820 North Oconto, Chicago, Illinois owned by Tim Description continued on attached page(s). YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO Notice to Deponent: 1. The deponent is a public or private corporation, partnership, association requested are as follows: Description continued on attached page(s). (A nonparty organization has a duty to designate one or more officers, and may set forth, for each person designated, the matters on which the continued on any party or witnesses shall exceed three hosy stipulation of the parties or by order upon showing that good cause to the continued of the parties of Daniel E Goodman, LLC Atty. No. 46715 Pro Se 99500 Name: Michael A. Moore / Law Office of Daniel E Goodman, LLC Atty. for: Plaintiff Address: 9701 W. Higgins Rd., Stc. 601	dor Michael Lammersfield (both residing at 5820 Northy Stokes and Paulette Stokes from January 1, 20 PUNISHMENT FOR CONTEMPT OF THIS a, or governmental agency. The matter(s) or directors, or managing agents, or other person at person will testify. Ill. Sup. Ct. Rule 206.) cording device, operated by (Name of Re- urs regardless of the number of parties havely warrants a lengthier examination. Ill. Sup. C Issued by: Sign Attorney	orth Counto, Chicago, II., 60631 60 through December 31, 2014 COURT. which examination is us to testify on its behalf, conling Desice Operator) ed in the case, except t. Rule 206(d).
in relation to the property located at 5820 North Oconto, Chicago, Illinois owned by Tim Description continued on attached page(s). YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO Notice to Deponent: 1. The deponent is a public or private corporation, partnership, association requested are as follows: Description continued on attached page(s). (A nonparty organization has a duty to designate one or more officers, and may set forth, for each person designated, the matters on which the 2. The deponent's testimony will be recorded by use of an audio-visual record of the parties or by order upon showing that good cause of the parties or by order upon showing that good cause of the parties of Daniel E Goodman, LLC Atty. No. 46715 Pro Se 99500 Name: Michael A. Moore / Law Office of Daniel E Goodman, LLC Atty. for: Plaintiff Address: 9701 W. Higgins Rd., Stc. 601 City/State/Zip: Rosemont/IL/60018	dor Michael Lammersfield (both residing at 5820 Northy Stokes and Paulette Stokes from January 1, 20 PUNISHMENT FOR CONTEMPT OF THIS a, or governmental agency. The matter(s) or directors, or managing agents, or other person t person will testify. Ill. Sup. Ct. Rule 206.) ording device, operated by (Name of Rel irs regardless of the number of parties havely warrants a lengthier examination. Ill. Sup. C Issued by: Attorney Clerk of Court	orth Oconto, Chicago, II., 60631 60 through December 31, 2014 COURT. which examination is us to testify on its behalf, cording Device Operator) red in the case, except t. Rule 206(d).
in relation to the property located at 5820 North Oconto, Chicago, Illinois owned by Tim Description continued on attached page(s). YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO Notice to Deponent: 1. The deponent is a public or private corporation, partnership, association requested are as follows: Description continued on attached page(s). (A nonparty organization has a duty to designate one or more officers, and may set forth, for each person designated, the matters on which the set of the deponent's testimony will be recorded by use of an audio-visual recorded by stipulation of the parties or by order upon showing that good cause to by stipulation of the parties or by order upon showing that good cause to the set of the set of the parties of Daniel E Goodman, LLC Atty. No. 46715 Pro Se 99500 Atty. for: Plaintiff Address: 9701 W. Higgins Rd., Stc. 601 City/State/Zip: Rosemont/IL/60018 Telephone: 847-292-6000	dor Michael Lammeraticid (both residing at 5820 Northy Strikes and Paulette Stokes from Jamury 1, 20 PUNISHMENT FOR CONTEMPT OF THIS II, or governmental agency. The matter(s) or the person will testify. III. Sup. Ct. Rule 206.) cording device, operated by (Name of Release regardless of the number of parties involvent as lengthier examination. III. Sup. Ct. Issued by: Sign. Attorney Clerk of Court Date: July I	orth Counto, Chicago, II., 60631 60 through December 31, 2014 COURT. which examination is sorting Device Operator) red in the case, except t. Rule 206(d).
in relation to the property located at \$820 North Oconto, Chicago, Illinois owned by Tim Description continued on attached page(s). YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO Notice to Deponent: L. The deponent is a public or private corporation, partnership, association requested are as follows: Description continued on attached page(s). (A acomparty organization has a duty to designate one or more officers, and may set forth, for each person designated, the matters on which the 2. The deponent's testimony will be recorded by use of an audio-visual record of the parties of by order upon showing that good cause to by stipulation of the parties or by order upon showing that good cause to the stipulation of the parties of Daniel E Goodman, LLC Atty. No. 46715 Pro Se 99500 Name: Michael A. Moore / Law Office of Daniel E Goodman, LLC Atty. for: Plaintiff Address: 9701 W. Higgins Rd., Stc. 601 City/State/Zip: Rosemont/IL/60018 Felephone: 847-292-6000 1 served this subpoena by mailing a copy, as required by Ill. Sup. Ct. Roles 1 by certified mail, return receipt requested (Receipt # 7015 0640 0001 5103 29)	dor Michael Lammersfield (both residing at 5820 Northy Strikes and Paulette Stokes from January 1, 20 PUNISHMENT FOR CONTEMPT OF THIS II, or governmental agency. The matter(s) or the person will testify. HI. Sup. Ct. Rule 206.) ording device, operated by (Name of Reservants a lengthier examination. HI. Sup. Ct. Issued by: Sign. Attorney Clerk of Court Date: July 1 1, 12 and 204(a)(2), to the above-named reciping 100 per	orth Counto, Chicago, II., 60631 60 through December 31, 2014 COURT. which examination is sortling Device Operator) red in the case, except t. Rule 206(d).
in relation to the property located at 5820 North Oconto, Chicago, Illinois owned by Tim Description continued on attached page(s). YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO Notice to Deponent: 1. The deponent is a public or private corporation, partnership, association requested are as follows: Description continued on attached page(s). (A nonparty organization has a duty to designate one or more officers, and may set forth, for each person designated, the matters on which the 2. The deponent's testimony will be recorded by use of an audio-visual record of the parties of by order upon showing that good cause that y. No. 46715 Pro Se 99500 Atty. No. 46715 Pro Se 99500 Atty. for: Plaintiff Address: 9701 W. Higgins Rd., Stc. 601 City/State/Zip: Rosement/IL/60018 Telephone: 847-292-6000	dor Michael Lammersfield (both residing at 5820 Northy Strikes and Paulette Stokes from January 1, 20 PUNISHMENT FOR CONTEMPT OF THIS II, or governmental agency. The matter(s) or the person will testify. HI. Sup. Ct. Rule 206.) ording device, operated by (Name of Reservants a lengthier examination. HI. Sup. Ct. Issued by: Sign. Attorney Clerk of Court Date: July 1 1, 12 and 204(a)(2), to the above-named reciping 100 per	orth Counto, Chicago, II., 60633 60 through December 31, 2014 COURT. which examination is useful govice Operator) red in the case, except t. Rule 206(d).
in relation to the property located at 5820 North Oconto, Chicago, Illinois owned by Tim Description continued on attached page(s). YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO Notice to Deponent: L. The deponent is a public or private corporation, partnership, association requested are as follows: Description continued on attached page(s). (A amparty organization has a duty to designate one or more officers, and may set forth, for each person designated, the matters on which the 2. The deponent's testimony will be recorded by use of an audio-visual record of the parties or by order upon showing that good cause to by stipulation of the parties or by order upon showing that good cause to the stipulation of the parties of Daniel E Goodman, LLC Atty. No. 46715 Pro Se 99500 Name: Michael A. Moore / Law Office of Daniel E Goodman, LLC Atty. for: Plaintiff Address: 9701 W. Higgins Rd., Stc. 601 City/State/Zip: Rosement/IL/60018 Telephone: 847-292-6000 1 served this subposens by mailing a copy, as required by Bl. Sup. Ct. Roles 1 by certified mail, return receipt requested (Receipt # 7015 0640 0001 5103 29)	dor Michael Lammersfield (both residing at 5820 Northy Strikes and Paulette Stokes from January 1, 20 PUNISHMENT FOR CONTEMPT OF THIS II, or governmental agency. The matter(s) or the person will testify. HI. Sup. Ct. Rule 206.) ording device, operated by (Name of Reservants a lengthier examination. HI. Sup. Ct. Issued by: Sign. Attorney Clerk of Court Date: July 1 1, 12 and 204(a)(2), to the above-named reciping 100 per	orth Counto, Chicago, IL, 60631 60 through December 31, 2014 COURT. which examination is to testify on its behalf, conling Device Operator) red in the case, except t. Rule 206(d).
in relation to the property located at \$820 North Oconto, Chicago, Illinois owned by Tim Description continued on attached page(s). YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO Notice to Deponent: I. The deponent is a public or private corporation, partnership, association requested are as follows: Description continued on attached page(s). (A nonparty organization has a duty to designate one or more officers, and may set forth, for each person designated, the matters on which the last deponent's testimony will be recorded by use of an audio-visual recorded by stipulation of the parties or by order upon showing that good cause of the parties of the parties of by order upon showing that good cause of the parties of Daniel E Goodman, LLC Atty. No. 46715 Pro Se 99500 Name: Michael A. Moore / Law Office of Daniel E Goodman, LLC Atty. for: Plaintiff Address: 9701 W. Higgins Rd., Stc. 601 City/State/Zip: Rosemon/IL/60018 Telephone: 847-292-6000 I served this subpoena by mailing a copy, as required by Ill. Sup. Ct. Roles I by certified mail, return receipt requested (Receipt # 7015 0640 0001 5103 29. I paid the witness S 25.00 for witness and milesgen.	dor Michael Lammersfield (both residing at 5820 Northy Stokes and Paulette Stokes from Jamury 1, 20 PUNISHMENT FOR CONTEMPT OF THIS n, or governmental agency. The matter(s) or directors, or managing agents, or other person te person will testify. III. Sup. Ct. Rule 206.) ording device, operated by (Name of Residents regardless of the number of parties involvent as lengthier examination. III. Sup. Ct. Issued by: Sign. Attorney Clerk of Court Date: July I 1, 12 and 204(a)(2), to the above-named reciping 10 on July 1 e fees.	orth Counto, Chicago, IL, 60631 60 through December 31, 2014 COURT. which examination is to testify on its behalf, conling Device Operator) red in the case, except t. Rule 206(d).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

JUL 1 1 2016

Michael A. Moore Law Office of Daniel E. Goodman, LLC 9701 W. Higgins Rd Suite 601 Rosemont, Illinois 60018

Re: Vicki Brady v. Timothy Stokes and Paulette Stokes

Date of Accident: March 4, 2014

Location of Accident: 5830 North Oconto, Chicago, IL 60631

Chicago Police Report No: HX172415

Dear Sir:

I am writing in response to the above-referenced subpoena, dated July 1, 2016, and received on July 6, 2016, by the Office of Regional Counsel, United States Environment Protection Agency (EPA) Region 5, Chicago, Illinois. The subpoena issued in the Circuit Court of Cook County, Illinois, commands copies of all documentation including, but not limited to recordings, call logs, correspondence, e-mails, reports, violation notices issued, photographs, diagrams, or any other documentation/information in EPA's possession regarding complaint's made by Vicki Brady and/or Michael Lammersfield (both residing at 5820 North Oconto, Chicago, IL 60631) in relation to the property located at 5820 North Oconto, Chicago, IL owned by Timothy Stokes and Paulette Stokes from January 1, 2000 through December 31, 2014.

The EPA has promulgated regulations with respect to requests for production of documents in proceedings where the United States is not a party. Sec 40 C.F.R. §§ 2.401 et seq. A copy of those regulations is enclosed. Under the regulations, the EPA must determine if a substantive response to a subpoena is clearly in the interest of the Agency. If, in the case of a request for documents, a determination is made that this prerequisite is not met, the Agency will answer the subpoena in accordance with established regulations.

This subpoena relates to a private action in the Circuit Court of Cook County, Illinois. Such actions are not within the scope of responsibilities of the EPA. Therefore, no interest of the Agency would be served in providing a substantive response to the subpoena. Given this finding, we will assume that you will withdraw the subpoena unless we hear further from you.

Enclosed is the \$25.00 check you sent with your subpoena, however, EPA will treat your request for documents listed in the subpoena as a Freedom of Information Act request. A bill will be forwarded to you with your documents. The Region 5 FOIA Office, (312 886-6686) (Mail Code: MRI-9J) will assign your request a FOIA number and direct your request to the proper office(s).

Sincerely,

T. Leverett Nelson

Regional Counsel

Enclosure